

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

PAT CASON-MERENDA and  
JEFFREY A. SUHRE on behalf of  
themselves and all others similarly situated,

Plaintiffs,

CASE NO.: 2:06-cv-15601

-v-

Hon. Gerald E. Rosen  
Magistrate: Donald A. Scheer

DETROIT MEDICAL CENTER,  
HENRY FORD HEALTH SYSTEM,  
MC LAREN HEALTH CARE CORP, d/b/a  
MOUNT CLEMENS REGIONAL MEDICAL  
CENTER, f/k/a MOUNT CLEMENS GENERAL  
OAKWOOD HEALTHCARE INC., BON  
SECOURS COTTAGE HEALTH SERVICES,  
WILLIAM BEAUMONT HOSPITAL, and  
TRINITY HEALTH CORP.,

Defendants.

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**DETROIT MEDICAL CENTER'S MOTION FOR LEAVE  
TO FILE DMC'S BRIEF IN SUPPORT OF ITS MOTION SEEKING DEFERRAL OF  
PLAINTIFFS' MOTIONS FOR PRELIMINARY APPROVAL OF CLASS  
SETTLEMENTS OR, AT A MINIMUM, DEFERRAL OF CLASS NOTICE  
UNDER SEAL PURSUANT TO PROTECTIVE ORDER**

Pursuant to U.S. District Court for the Eastern District of Michigan Local Rule 5.3(b)(2) and Section 3 of the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information, [D.E. 61] ("Protective Order"), Detroit Medical Center (DMC) respectfully requests this Court to seal its brief in support of Detroit Medical Center's motion seeking deferral of plaintiffs' motions for preliminary approval of class settlements or, at a minimum, deferral of class notice ("Brief") and the accompanying exhibits to the Brief.

The Brief contains confidential information and attaches as exhibits documents bearing confidentiality designations that are subject to the Protective Order. Section 3 of the Protective Order requires parties to file confidential information under seal. (See D.E. 61 at 7-8).

Accordingly, DMC respectfully requests that this Court enter an order sealing the Brief and accompanying exhibits. A proposed order is submitted herewith.

DETROIT MEDICAL CENTER,  
LEGAL AFFAIRS

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Dated: November 3, 2009

**CERTIFICATE OF SERVICE**

I, Charles N. Raimi, an attorney of record in this case, hereby certify that I have caused a copy of the foregoing to be served electronically on the following counsel of record this 3<sup>rd</sup> day of November, 2009.

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